

REMARKS

This is a full and timely response to the outstanding final Office Action mailed December 1, 2004. Upon entry of this response, claims 1-22 are pending in the application. Applicant respectfully requests that there be reconsideration of all pending claims.

1. Rejection of Claims 1-22 under 35 U.S.C. §102

Claims 1-22 have been rejected under §102(b) as allegedly anticipated by *Hobbs* (U.S. 6,523,022). Applicant respectfully traverses these rejections. A proper rejection of a claim under 35 U.S.C. §102 requires that a single prior art reference disclose each element of the claim. *See, e.g., W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983).

a. Claims 1 and 8

Applicant respectfully submits that *Hobbs* fails to teach, disclose or suggest at least the feature of “under control of an interface component on a server computer system...initiating a remote invocation of a user component object on the target computer system in response to the user request” as recited in claims 1 and 8.

1) The Passages in *Hobbs* Cited in the Office Action Do Not Disclose This Feature

The Office Action alleges that the data warehouse in *Hobbs* corresponds to the claimed “target system.” (Office Action, p. 9, last paragraph). Applicant will assume, *arguendo*, this is true.

The Office Action further alleges that *Hobbs*’ teaching of a Java Remote Method Invocation interface corresponds to the claimed “initiating a remote invocation of a user component object on the target computer system.” (Office Action, p. 9, last paragraph).

Applicant disagrees, and asserts that the cited passage in *Hobbs* which teaches Remote Method Invocation does not describe the interface between a server and a data warehouse/target system. Instead, it describes the interface between client 203 and document server 202 in FIG. 2.

Therefore, Col. 13, line 60 through Col. 14, line 16 of *Hobbs* teaches client 203 making a request to a document server 202 through APIs such as RMI, but not “the server obtaining the requested resource [on the data warehouse] by using various APIs such as Java's Remote Method Invocation” as alleged in the Office Action. (Office Action, p. 9, last paragraph).

The cited passage in *Hobbs* therefore teaches client 203 remotely invoking an object on document server 202. In contrast, claims 1 and 8 recite a server receiving a user request, and the server “initiating a remote invocation of a user component object *on the target computer system* in response to the user request.”

2) Other Passages in *Hobbs* Do Not Disclose This Feature

As argued above, the particular passage in *Hobbs* relied on by the Office Action does not disclose, teach, or suggest the feature recited above. Nor does the rest of *Hobbs*.

Although FIG. 3 shows a Data Warehouse 230, the interfaces between Front End Communication Servers 210, Database Interface 220, and Data Warehouse 230 are not described at all. Thus, FIG. 3 and the accompanying text in *Hobbs* do not disclose, teach, or suggest the above-recited feature of claims 1 and 8.

FIG. 4 also contains a Data Warehouse 230. However, the text accompanying FIG. 4 (Col. 15, Line 29 to Col. 17, line 16) does not discuss remote invocation of an object on the Data Warehouse 230. These passages do describe interfaces used by the Proxy Gateway Server 207 and Database HTTP Server 211: HTTP and CGI (Col. 15, lines 59-61); ISAPI and ASP (Col. 21, lines 45-50); Java Servlet API (Col. 21, lines 50-58); Sun Microsystems Java applets or Microsoft's Active X (Col. 22, lines 5-10):

Even assuming that the “server” recited in claims 1 and 8 corresponds to either the Proxy Gateway Server 207 or the Database HTTP Server 211, the server interfaces disclosed in *Hobbs* are not equivalent to remotely invoking an object on the Data Warehouse 230.

For at least the reason that *Hobbs* fails to disclose, teach or suggest “under control of an interface component on a server computer system...initiating a remote invocation of a user component object on the target computer system in response to the user request,” Applicant respectfully submits that *Hobbs* does not anticipate claims 1 and 8. Therefore, Applicant requests that the Examiner’s rejection of claims 1 and 8 be withdrawn.

b. Claim 15

Applicant respectfully submits that *Hobbs* fails to teach, disclose or suggest at least the feature of “a first server computer system including a plurality of computer resources and including a user component object, the user component object being adapted to receive a remote invocation...and a second server computer system coupled to the first server and including an interface component that is adapted to receive a user request to access a desired computer resource, the interface component applying the remote invocation to the user component object” as recited in claim 15.

1) The Passages in *Hobbs* Cited in the Office Action Do Not Disclose This Feature

The Office Action alleges that

the cited figures teach a client initiating a request to a server to access a resource on the data warehouse (interpreted as a target computer system). In response to the client request, the server connects to the data warehouse, finds and retrieves the requested resource and returns it to the client. Col. 13, lines 60 thru col. 14, line 16 of *Hobbs* teaches the server obtaining the requested resource by using various APIs such as Java's Remote Method Invocation or RMI (col. 14, lines 15-16). Through the use of RMI, the remote invocation on the data warehouse is received and the client is able to access the desired resource.

(Office Action, p. 9, last paragraph.)

Thus, the Office Action appears to allege the data warehouse in *Hobbs* corresponds to the claimed “first server computer system including a plurality of resources and including a user component object,” and that the Java Remote Method Invocation interface in *Hobbs* corresponds to the claimed “the user component object being adapted to receive a remote invocation.”

Applicant will assume, *arguendo*, that the first allegation is true. However, Applicant disagrees with the second allegation, and asserts that the cited passage in *Hobbs* teaching Remote Method Invocation does not describe the interface between a server and a data warehouse/first server computer system. Instead, it describes the interface between client 203 and document server 202 in FIG. 2. Therefore, Col. 13, line 60 through Col. 14, Line 16 of *Hobbs* teaches client 203 making a request to a document server 202 through APIs such as RMI, but not “the server obtaining the requested resource [on the data warehouse] by using various APIs such as Java's Remote Method Invocation” as alleged in the Office Action. (Office Action, p. 9, last paragraph.)

The cited passage in *Hobbs* therefore teaches client 203 remotely invoking an object on document server 202. In contrast, claim 15 recites “a second server computer system...applying the remote invocation to the user component object in response to the received user request,” and “a first server computer system including a plurality of resources and including a user component object the user component object being adapted to receive a remote invocation and operable in response to the remote invocation to access a computer resource.” Thus, in Applicant's claimed invention as defined in claim 15 includes one server receiving a user request, where that same server remotely invokes an object on another server.

2) Other Passages in *Hobbs* Do Not Disclose This Feature

As argued above, the particular passage in *Hobbs* relied on by the Office Action does not disclose, teach, or suggest the feature recited above. Nor does the rest of *Hobbs*.

Although FIG. 3 shows a Data Warehouse 230, the interfaces between Front End Communication Servers 210, Database Interface 220, and Data Warehouse 230 are not described at all. Thus, FIG. 3 and the accompanying text in *Hobbs* do not disclose, teach, or suggest the above-recited feature of claim 15.

FIG. 4 also contains a Data Warehouse 230. However, the text accompanying FIG. 4 (Col. 15, Line 29 to Col. 17, line 16) does not discuss remote invocation of an object on the Data Warehouse 230. These passages do describe interfaces used by the Proxy Gateway Server 207 and Database HTTP Server 211: HTTP and CGI (Col. 15, lines 59-61); ISAPI and ASP (Col. 21, lines 45-50); Java Servlet API (Col. 21, lines 50-58); Sun Microsystems Java applets or Microsoft's Active X (Col. 22, lines 5-10).

Even assuming that the "server" recited in claim 15 corresponds to either the Proxy Gateway Server 207 or the Database HTTP Server 211, the server interfaces disclosed in *Hobbs* are not equivalent to remotely invoking an object on the Data Warehouse 230.

For at least the reason that *Hobbs* fails to disclose, teach or suggest "a first server computer system including a plurality of computer resources and including a user component object, the user component object being adapted to receive a remote invocation...and a second server computer system coupled to the first server and including an interface component that is adapted to receive a user request to access a desired computer resource, the interface component applying the remote invocation to the user component object," Applicant respectfully submits that *Hobbs* does not anticipate claim 15. Therefore, Applicant requests that the Examiner's rejection of claim 15 be withdrawn.

c. Claim 18

Applicant respectfully submits that *Hobbs* fails to teach, disclose or suggest at least the feature of “a first server computer system including...a component object stub generating a remote invocation command; and a second server computer system coupled to the component object stub...accessing the plurality of computer resources to obtain user data in response to the remote invocation command” as recited in claim 18.

1) The Passages in *Hobbs* Cited in the Office Action Do Not Disclose This Feature

The Office Action alleges that

the cited figures teach a client initiating a request to a server to access a resource on the data warehouse (interpreted as a target computer system). In response to the client request, the server connects to the data warehouse, finds and retrieves the requested resource and returns it to the client. Col. 13, lines 60 thru col. 14, line 16 of *Hobbs* teaches the server obtaining the requested resource by using various APIs such as Java's Remote Method Invocation or RMI (col. 14, lines 15-16). Through the use of RMI, the remote invocation on the data warehouse is received and the client is able to access the desired resource.
(Office Action, p. 9, last paragraph.)

Thus, the Office Action appears to allege the data warehouse in *Hobbs* corresponds to the claimed “second server computer system” and that the Java Remote Method Invocation interface in *Hobbs* corresponds to the claimed “second server computer system coupled to the component object stub...accessing the plurality of computer resources to obtain user data in response to the remote invocation command.”

Applicant will assume, *arguendo*, that the first allegation is true. However, Applicant disagrees with the second allegation, and asserts that the cited passage in *Hobbs* teaching Remote Method Invocation does not describe the interface between a server and a data warehouse/target system. Instead, it describes the interface between client 203 and document server 202 in FIG. 2. Therefore, Col. 13, line 60 through Col. 14, line 16 of *Hobbs* teaches client 203 making a request

to a document server 202 through APIs such as RMI, but not “the server obtaining the requested resource [on the data warehouse] by using various APIs such as Java's Remote Method Invocation” as alleged in the Office Action. (Office Action, p. 9, last paragraph).

The cited passage in *Hobbs* therefore teaches client 203 remotely invoking an object on document server 202. In contrast, claim 18 recites “a first server computer system including...a component object stub generating a remote invocation command”, and “a second server computer system coupled to the component object stub...accessing the plurality of computer resources to obtain user data in response to the remote invocation command.” Thus, in Applicant’s claimed invention as defined in claim 18 includes one server receiving a user request, where that same server remotely invokes an object on another server.

2) Other Passages in *Hobbs* Do Not Disclose This Feature

As argued above, the particular passage in *Hobbs* relied on by the Office Action does not disclose, teach, or suggest the feature recited above. Nor does the rest of *Hobbs*.

Although FIG. 3 shows a Data Warehouse 230, the interfaces between Front End Communication Servers 210, Database Interface 220, and Data Warehouse 230 are not described at all. Thus, FIG. 3 and the accompanying text in *Hobbs* does not disclose, teach, or suggest the above-recited feature of claim 18.

FIG. 4 also contains a Data Warehouse 230. However, the text accompanying FIG. 4 (Col. 15, Line 29 to Col. 17, line 16) does not discuss remote invocation of an object on the Data Warehouse 230. These passages do describe interfaces used by the Proxy Gateway Server 207 and Database HTTP Server 211: HTTP and CGI (Col. 15, lines 59-61); ISAPI and ASP (Col. 21, lines 45-50); Java Servlet API (Col. 21, lines 50-58); Sun Microsystems Java applets or Microsoft’s Active X (Col. 22, lines 5-10).

Even assuming that the “server” recited in claim 18 corresponds to either the Proxy Gateway Server 207 or the Database HTTP Server 211, the server interfaces disclosed in *Hobbs* are not equivalent to remotely invoking an object on the Data Warehouse 230.

For at least the reason that *Hobbs* fails to disclose, teach or suggest “a first server computer system including...a component object stub generating a remote invocation command; and a second server computer system coupled to the component object stub...accessing the plurality of computer resources to obtain user data in response to the remote invocation command,” Applicant respectfully submits that *Hobbs* does not anticipate claim 18. Therefore, Applicant requests that the Examiner’s rejection of claim 18 be withdrawn.

d. Claims 2-7, 9-14, 16-18, and 20-22

Since claims 1, 8, 15, and 19 are allowable, Applicant respectfully submits that claims 2-7, 9-14, 16-18, and 20-22 are allowable for at least the reason that each depends from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicant respectfully requests that the rejection of claims 2-7, 9-14, 16-18, and 20-22 be withdrawn.

CONCLUSION

Applicant respectfully requests that all outstanding objections and rejections be withdrawn and that this application and presently pending claims 1-22 be allowed to issue. If the Examiner has any questions or comments regarding Applicant's response, the Examiner is encouraged to telephone Applicant's undersigned counsel.

Respectfully submitted,

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